

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE: AUTOMOTIVE PARTS
ANTITRUST LITIGATION

: Master File No. 12-md-02311
: Honorable Marianne O. Battani

IN RE: WIRE HARNESS : Case No. 2:12-cv-00103-MOB-MKM
IN RE: INSTRUMENT PANEL CLUSTERS : Case No. 2:12-cv-00203-MOB-MKM
IN RE: FUEL SENDERS : Case No. 2:12-cv-00303-MOB-MKM
IN RE: HEATER CONTROL PANELS : Case No. 2:12-cv-00403-MOB-MKM
IN RE: OCCUPANT SAFETY RESTRAINT
SYSTEMS : Case No. 2:12-cv-00603-MOB-MKM
IN RE: ALTERNATORS : Case No. 2:13-cv-00703-MOB-MKM
IN RE: RADIATORS : Case No. 2:13-cv-01003-MOB-MKM
IN RE: STARTERS : Case No. 2:13-cv-01103-MOB-MKM
IN RE: SWITCHES : Case No. 2:13-cv-01303-MOB-MKM
IN RE: IGNITION COILS : Case No. 2:13-cv-01403-MOB-MKM
IN RE: MOTOR GENERATORS : Case No. 2:13-cv-01503-MOB-MKM
IN RE: STEERING ANGLE SENSORS : Case No. 2:13-cv-01603-MOB-MKM
IN RE: HID BALLASTS : Case No. 2:13-cv-01703-MOB-MKM
IN RE: INVERTERS : Case No. 2:13-cv-01803-MOB-MKM
IN RE: AIR FLOW METERS : Case No. 2:13-cv-02003-MOB-MKM
IN RE: FUEL INJECTION SYSTEMS : Case No. 2:13-cv-02203-MOB-MKM
IN RE: AUTOMATIC TRANSMISSION
FLUID WARMERS : Case No. 2:13-cv-02403-MOB-MKM
IN RE: VALVE TIMING CONTROL DEVICES: Case No. 2:13-cv-02503-MOB-MKM
IN RE: ELECTRONIC THROTTLE BODIES : Case No. 2:13-cv-02603-MOB-MKM
:

THIS DOCUMENT RELATES TO :
ALL END - PAYOR ACTIONS :

JOINT OBJECTION TO PROPOSED CLASS ACTION
SETTLEMENTS AND REQUEST FOR ATTORNEYS' FEES

Class Members Olen York (Claimant No. 9A791897D5), Amy York (Claimant No. F0619D2B2C), and Nancy York (Claimant No. 2D7FB72438) (“Objectors”) join in objecting to the adequacy, fairness and reasonableness of the proposed class action settlements (specifically Autoliv, Inc.) and request for attorneys’ fees based upon the factual and legal grounds set forth below. Objectors qualify to participate in one or more of the class settlements because they purchased the following qualified vehicles from automobile dealerships in the state of West Virginia during the class period that they believe contain eligible automobile parts:¹

- *2003 Toyota Corolla* (Vin No. JTDBR32E230012891) -- purchased by Olen York in August 2002 from Mike Ferrell Toyota in Chapmanville, WV;
- *2009 Ford Escape XLT 2.5L* (Vin No. 1FMCU03739KA59048) -- purchased by Amy York on May 23, 2009 from River Cities Ford in Lavalette, WV; and
- *2010 Ford Focus SE 2.0L* (Vin No. 1FAHP3FN9AW117065) -- purchased by Olen York, Jr. (deceased) and Nancy York on September 12, 2009 from Stephens Auto in Danville, WV.

Objectors made the following efforts to identify eligible parts in their vehicles: reviewed class notice, settlement website, Autoliv settlement and Second Amended Complaint; called class settlement hotline; wrote to settlement administrator; reviewed manufacturer recalls; requested dealership assistance; ran VIN reports; and conducted internet research. Although Objectors have not pinpointed all eligible parts at time of filing this joint objection, they have good faith grounds to believe they qualify for class membership.² For a variety of reasons (set forth below), Objectors’ difficulty in verifying their class membership is cause alone to reject the proposed settlements.

¹ Supporting documentation is attached as Exhibit A.

² The current data suggest at least one vehicle contains Autoliv’s occupant safety system. Objectors reserve the right to amend or supplement their objections after obtaining additional evidence of their class membership.

ARGUMENT

I. ANY SETTLEMENT THAT MAKES IT VIRTUALLY IMPOSSIBLE TO VERIFY CLASS MEMBERSHIP IS FUNDAMENTALLY UNFAIR BECAUSE THE CLASS DEFINITION IS IMPRACTICAL, THE CLASS NOTICE IS DECEPTIVE, AND INDIVIDUAL ISSUES ARE CERTAIN TO PREDOMINATE—GUARANTEEING A HOPELESSLY UNMANAGEABLE CLASS.

In what can only be called a farce, the parties to a dozen well-publicized auto parts settlements are waving \$225 million in cash awards at millions of car owners across the country—knowing full well that precious few will ever see a dime because *there is no reasonable or efficient way to establish class membership.*³ As demonstrated below, the repercussions from this major defect have fatally infected each settlement. Short of judicial intervention, these “consumer” actions will suffer the same fate as so many have before them: *a minuscule claims rate.*⁴ Accordingly, this Court’s final approval should be stayed pending publication on the settlement website of a reasonable means for class members to determine which of the covered auto parts are installed in their qualified vehicle.

A. Absent a Reliable and Efficient Method for Linking Covered Parts to Qualified Vehicles, the Class Definition Offers a Form of Clarity Without Any Substance.

First and foremost is the longstanding principle that “[t]he class definition must be sufficiently definite so that it is *administratively feasible* for the court to determine whether a particular individual is a member of the proposed class.” *Young v. Nationwide Mut. Ins. Co.*, 693 F.3d 532, 537-538 (6th Cir. 2012) (citing 5 James W. Moore et al., Moore’s Federal Practice § 23.21[1] (Matthew Bender 3d ed. 1997); see also *John v. Nat’l Sec. Fire & Cas. Co.*, 501 F.3d

³ Unless otherwise indicated, all bold and italicized words are supplied by Objectors.

⁴ Among six class settlements recently analyzed, five delivered minuscule funds to the class: .000006%, .33%, 1.5%, 9.66%, and 12%. “Do Class Actions Benefit Class Members? An Empirical Analysis of Class Actions” (Mayer Brown 2014) at 2.

443, 445 (5th Cir. 2007). A precise definition allows the Court to determine who would be entitled to relief, who would be bound by a judgment, and who is entitled to notice of the action. “For a class to be sufficiently defined, the court must be able to resolve the question of whether class members are included or excluded from the class by reference to objective criteria.” Moore’s Federal Practice § 23.21[3]. This standard assumes, however, that interested individuals can actually *apply* the objective criteria to determine whether they are members of the affected class. See, e.g. *Young v. Nationwide Mut. Ins. Co.*, 693 F.3d at 537 (class membership determined by property location, governmental boundaries, local tax payable & local tax charged); *Kinder v. Nw. Bank*, 278 F.R.D. 176, 183 (W.D.Mich.2011) (class membership shown by using defendant’s ATM at specified location during relevant period for a fee). When an ordinary person cannot make use of the “objective criteria” after exercising reasonable diligence, the parties must provide an efficient mechanism to aid in the process. See, e.g. *Young v. Nationwide Mut. Ins. Co.*, 693 F.3d 532, 540 (6th Cir. 2012) (“Plaintiffs further support administrative feasibility through expert evidence that Defendants’ policy records are in a form compatible with geocoding software”); *Tchobolian v. Parking Concepts*, 2009 U.S. Dist. LEXIS 62122, *13-14 (C.D. Cal. July 16, 2009) (class members could *self-identify* since they “were either provided a receipt or they were not”).

No such assistance is offered in the present settlements. Instead, the parties tease millions of car owners with a provocative announcement about multi-million dollar settlements without giving them any reasonable way to cash in. According to the long-form notice:

Generally, you are included if, at any time between 1998 and 2015, ***depending upon the component part***, you: (1) bought or leased a new motor vehicle in the U.S. (not for resale), or (2) indirectly paid for a motor vehicle replacement part (not for resale). Indirectly means you bought the vehicle replacement part from someone other than the manufacturer of the part.

The list of covered OEM parts reads like a “Who’s Who” in auto mechanics: air flow meters, alternators, ATF warmers, automotive wire harness systems, electronic throttle bodies, fuel injection systems, fuel senders, heater control panels, high intensity discharge ballasts, ignition coils, instrument panel clusters, inverters, motor generators, occupant safety restraint systems, radiators, starters, steering angle sensors, switches and valve timing control devices. To make matters worse, neither the class notice nor the settlement website provides any reasonable means for ordinary consumers to “connect the dots” between covered parts and qualified cars. Instead, the parties simply repeat the obvious:

Generally, you may be included in one or more Settlements if, at any time from 1998 to 2015, you: (1) bought or leased a new motor vehicle in the U.S. (not for resale), or (2) paid to replace one or more of the new motor vehicle parts listed in Question 5 above (not for resale). New motor vehicles include, but are not limited to, automobiles, cars, light trucks, pickup trucks, crossovers, vans, mini-vans, and sport utility vehicles.

For further assistance, readers are encouraged to visit the settlement website, to read any complaint, to review any settlement agreement, or to call the settlement hotline. However, none of these resources provides any meaningful help in connecting the dots between covered parts and qualified vehicles. In fact, there are no records *whatsoever* to determine class membership. One can only conclude that the parties have no internal data to identify class member status. Neither does the Settlement Administrator have any reliable and administratively feasible method for verifying and processing claims.

B. The Class Members’ Inability to Link Covered Parts with Qualified Vehicles Also Renders the Class Notice Inadequate for Purposes of Satisfying Due Process.

This fatal defect also has constitutional implications. It is unfair to subject people to a binding judicial proceeding in which their rights or interests are at stake without enabling them to determine their class status. *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306

(1950). “The class definition must be clear in its applicability so that it will be clear later on whose rights are merged into the judgment, that is, who gets the benefit of any relief and who gets the burden of any loss.” *Xavier v. Philip Morris USA Inc.*, 787 F. Supp. 2d 1075, 1089 (N.D. Cal. 2011). An adequate class notice enables potential class members to identify themselves for purposes of opting out of the class. *Carrera v. Bayer Corp.*, 727 F.3d 300, 307 (3d Cir. 2013). It should gain the readers’ attention, show its connection to their lives, and ***prompt them to action.*** Managing Class Action Litigation: A Pocket Guide for Judges, at 18-19 (Federal Judicial Center, 2005). The Notice provided to Objectors is not the best notice practicable because the Class is not clearly defined so that the public can read it, determine class membership, and decide whether or not to participate in the settlement. The deficiencies of the Notice harm both absent class members that want to participate in the Settlements, and those that would rather request exclusion and file individual actions.

C. As a Result of the Parties’ Failure to Link Covered Parts with Qualified Vehicles, Individual Issues On Defendants’ Liability Are Bound to Predominate—Making the Classes Hopelessly Unmanageable.

Because the proposed Settlements demand individualized procedures to determine class membership, the class will become unmanageable. “If class members are impossible to identify without ***extensive and individualized fact-finding*** or ‘mini-trials,’ then a class action is inappropriate.” *Marcus v. BMW of North America, LLC*, 687 F.3d 583, 593 (3rd Cir. 2012). When “the only way to distinguish between the two sets of individuals is to engage in individualized fact-finding,” the class definition is inherently unsatisfactory. *Romberio v. Unumprovident Corp.*, 385 F.Appx. 423, 431 (6th Cir. 2009).

Thus, the Sixth Circuit has expressly rejected class definitions in which “the only way to distinguish between the two sets of individuals [one of which is in the class and the other not] is

to engage in individualized fact-finding.” *Romberio v. Unumprovident Corp.*, 385 F.Appx. 423, 431 (6th Cir. 2009). At best, the absence of a reliable source for linking covered parts to qualified vehicles will force class members to establish their claims through individual hearings; at worst, it will act as a strong deterrent to filing a claim. This same procedural defect will cause incurable manageability issues that invite fraudulent claims. “It is unfair to absent class members if there is a significant likelihood their recovery will be diluted by fraudulent or inaccurate claims.” *Carrera v. Bayer Corp.*, 727 F.3d 300, 310 (3rd Cir. 2013). All things considered, the parties’ failure to provide class members any meaningful way to connect covered parts with qualified vehicles is sufficient cause alone to deny their motions.

II. IT IS ALSO UNREASONABLE TO COMMIT UNCLAIMED FUNDS TO UNNAMED CY PRES RECIPIENTS INSTEAD OF INCREASING THE CLASS’ RECOVERY.

Apart from this fundamental defect in the claims process, the proposed settlements unduly divert unclaimed funds to unnamed *cy pres* recipients instead of enhancing the class awards. Even surplus distributions to *disclosed* charities “have been controversial in the courts of appeals.” *Powell v. Ga.-Pac. Corp.*, 119 F.3d 703, 706 (8th Cir. 1997); *Ira Holtzman, C.P.A. v. Turza*, 728 F.3d 682, 689-90 (7th Cir. 2013); *In re Baby Prods. Antitrust Litig.*, 708 F.3d 163, 172-73 (3d Cir. 2013); *In re Lupron*, 677 F.3d at 29-33; *Nachshin*, 663 F.3d at 1038-40; *Klier v. Elf Atochem N. Am., Inc.*, 658 F.3d 468, 473-82 (5th Cir. 2011); *In re Katrina Canal Breaches Litig.*, 628 F.3d 185, 196 (5th Cir. 2010); *Masters v. Wilhelmina Model Agency, Inc.*, 473 F.3d 423, 434-36 (2d Cir. 2007); *Wilson v. Sw. Airlines, Inc.*, 880 F.2d 807, 816 (5th Cir. 1989). In general, the diversion of unclaimed funds to a non-party runs counter to the litigation’s stated purpose. Accordingly, the American Law Institute recommends the following procedure:

- (a) If individual class members can be identified through reasonable effort, and the distributions are sufficiently large to make individual distributions economically

viable, settlement proceeds should be distributed *directly* to individual class members.

(b) If the settlement involves individual distributions to class members and funds remain after distributions (because some class members could not be identified or chose not to participate), the settlement should presumptively provide for further distributions to participating class members *unless* the amounts involved are too small to make individual distributions economically viable or other specific reasons exist that would make such further distributions impossible or unfair.

(c) If the court finds that individual distributions are not viable based upon the criteria set forth in subsections (a) and (b), the settlement may utilize a *cy pres* approach. The court, when feasible, should require the parties to *identify* a recipient whose interests *reasonably approximate* those being pursued by the class. If, and only if, no recipient whose interest reasonably approximate those being pursued by the class can be identified after thorough investigation and analysis, a court may approve a recipient that does not reasonably approximate the interests being pursued by the class.

Principles of the Law of Aggregate Litigation, § 3.07 (2010). When a district court concludes that a *cy pres* distribution is appropriate after applying the foregoing rigorous standards, such a distribution must be “for the next best use . . . for indirect class benefit,” and “for uses consistent with the nature of the underlying action and with the judicial function.” *In re Katrina*, 628 F.3d at 196 (quotations omitted); accord *Klier*, 658 F.3d at 474; *Nachshin*, 663 F.3d at 1040; *Holtzman*, 728 F.3d at 689-90; ALI § 307(c) (“a recipient whose interests reasonably approximate those being pursued by the class”). As stated in *Airline Tickets II*, 307 F.3d at 682: “The unclaimed funds should be distributed for a purpose as near as possible to the legitimate objectives underlying the lawsuit, the interests of class members, and the interests of those similarly situated.”

Despite the obvious need to adopt these precautionary measures, the auto parts Notice is conspicuously silent about the safeguards for earmarking surplus cash. Neither are potential charities named so class members can evaluate their relevance to the suit. Given the real potential for millions of class dollars to remain unclaimed due to a burdensome claims procedure, the lack of attention to this important topic is chilling. The whole subject is summarized in a sentence:

“It’s possible that any money remaining after claims are paid will be distributed to charities, governmental entities, or other beneficiaries approved by the Court.” On this independent ground, the parties’ motions for final approval should be denied with instructions: (1) to incorporate a clear procedure for implementing the ALI’s safeguards; and (2) to identify several charities whose interests reasonably approximate those of the class.

III. THE UNREASONABLENESS OF CLASS COUNSEL’S FEE REQUEST IS DEMONSTRATED BY APPLYING THE SIXTH CIRCUIT’S FACTORS TO THE CIRCUMSTANCES PRESENTED.

The fallout of the fundamental defect in the claims process even spills over to class counsel’s fee petition. In *Van Horn v. Nationwide Prop. & Cas. Ins. Co.*, 436 F. App’x 496 (6th Cir. 2011), the Sixth Circuit upheld a district court’s decision to reduce class counsel’s requested fees from \$5.9 million to \$3.2 million in a settlement of a class action involving auto-insurance benefits. In affirming the decision, the court pointed out the district court “did not believe that the class members received an especially good benefit [because] Class Counsel chose to pursue a relatively insignificant claim” as opposed to “other potential claims, . . . and *[they] agreed to a settlement mechanism which yielded a low claims rate[.]*” *Id.* at 500. In the interest of securing lucrative fees, class counsel has allowed a defective claims mechanism to infect every settlement. As a result, Objectors believe that class participation in the settlement pool will fall under 1%. Placing self-interest over the class’ interest is a straight line to a lower award. See, e.g. *Greenberg v. Procter & Gamble Co. (In re Dry Max Pampers Litig.)*, 724 F.3d 713, 719 (6th Cir. 2013); *Vasalle v. Midland Funding LLC*, 708 F.3d 747, 755 (6th Cir. 2013). This is sufficient cause alone to deny class counsel’s petition.

Irrespective of class participation, class counsel’s motion falls far short of demonstrating why they deserve 30% of a mega-fund settlement made possible by governmental prosecution.

See Bowling v. Pfizer, Inc., 132 F.3d 1147, 1152 (6th Cir. 1998) (“The district court should pay particularly close attention to counsel’s fee requests, because this money comes from the beneficiaries, not from the defendants.”). The complexity of the issues is a significant factor to be considered in making a fee award. In the present case, class counsel freely admits piggy backing off the government’s intensive efforts to uncover an unlawful price-fixing conspiracy among the defendants. Where a government body has obtained a guilty plea, criminal conviction, or civil judgment against a defendant, class counsel in a “piggyback” class action arising out of the same set of facts face a reduced risk of loss and a reduced risk or burden of discovery and trial. A reasonable attorney fee in such cases may be the value that class counsel adds to the settlement that would have been available to the class but for the counsel’s work. See, e.g., *Swedish Hospital Corp. v. Shalala*, 1 F.3d 1261, 1272 (D.C. Cir. 1993).” Managing Class Action Litigation: A Pocket Guide for Judges, at 24 (Federal Judicial Center, 2005).

In the present case, it is uncontested that the Department of Justice (“DOJ”) engaged in significant pre-complaint investigation efforts, prosecuted defendants for their antitrust violations, and secured convictions. Indeed, the DOJ began investigating criminal price-fixing and bid-rigging conspiracies years before class counsel even filed suit. In September 2011, the DOJ secured its first criminal convictions against Furukawa Electric Co. Ltd. for its role in a criminal price-fixing and bid-rigging conspiracy involving the sale of parts to automobile manufacturers. As applied to Autoliv, Inc., Plaintiffs’ Second Amended Complaint avers as follows:

5. The U.S. Department of Justice’s (“DOJ”) Antitrust Division is currently conducting a broad criminal investigation into illegal price-fixing and bid-rigging in the automotive parts industry. As part of its criminal investigation, the DOJ is seeking information about unlawful anticompetitive conduct in the market for a number of different but related automotive parts, and the Federal Bureau of Investigation (“FBI”) has participated in raids, pursuant to search warrants, carried out in the offices of a number of major competitors in the automotive parts industry. The automotive parts investigation is the largest criminal investigation the Antitrust

Division has ever pursued, both in terms of its scope and its impact on American consumers and businesses. The ongoing cartel investigation of price-fixing and bid-rigging in the automotive parts industry has yielded more than \$2.4 billion in criminal fines to date.

6. Defendant Autoliv, Inc. has agreed to plead guilty and pay a \$14.5 million fine for its unlawful conduct in conspiring with others to suppress and eliminate competition in the automotive parts industry by agreeing to rig bids for, and to fix, stabilize and maintain the prices of, Occupant Safety Restraint Systems sold to certain automobile manufacturers in the United States and elsewhere at various times from at least as early as March 2006 and continuing until at least February 2011. The combination and conspiracy engaged in by Defendant Autoliv, Inc. and its co-conspirators was in unreasonable restraint of interstate and foreign trade and commerce in violation of the Sherman Antitrust Act, 15 U.S.C. §1.

Even Plaintiffs' motion for final approval concedes that “[m]any of the Settling Defendants pleaded guilty to the very conduct alleged by EPPs in their complaints.” Motion, at 12. Moreover, they intend to continue riding the DOJ’s coattails in order to corral the remaining Defendants. Autoliv’s agreement to cooperate is typical:

On or before July 15, 2014, Counsel for Autoliv shall provide Settlement Class Counsel with the identity of all current and former employees of Autoliv who: (1) were interviewed and/or prosecuted by the United States Department of Justice (“DOJ”), the Japanese Fair Trade Commission, the European Commission, or any other government entity (collectively, referred to as “Government Entities”) in connection with alleged violations with respect to Occupant Safety Restraint Systems; (2) appeared before the grand jury in the DOJ’s investigation into alleged violations with respect to Occupant Safety Restraint Systems; and/or (3) were disclosed to a Government Entity as having knowledge or information relating to investigations into alleged violations with respect to Occupant Safety Restraint Systems.

See, Autoliv Settlement Agreement, para. 30. Because the DOJ’s investigations and convictions paved the way for Plaintiffs’ success, the risk and complexity of class counsel’s enhancement was minimal. *In re First Databank Antitrust Litigation*, 209 F. Supp. 2d 96, 98 (D.D.C. 2002). Consequently, a proper fee award will reflect ***class counsel’s contribution*** to the settlement’s value. *Goldberger v. Integrated Resources, Inc.*, 209 F.3d 43, 53-54 (2d Cir. 2000) (4% fee awarded, in part because counsel benefitted from work done by federal authorities); see

also *Quantum Health Resources, Inc.*, 962 F. Supp. 1254, 1259 (C.D. Cal. 1997) (court reduced “benchmark” percentage to 10% due to government’s involvement); *In re First Databank Antitrust Litigation*, 209 F. Supp. 2d 96, 98 (D.D.C. 2002) (reducing fee award due to Federal Trade Commission’s work reducing risk and complexity to counsel). Because the DOJ’s legwork significantly reduced class counsel’s risk in bringing these actions while increasing their chance of success, class counsel’s fee award should be adjusted accordingly.

Class counsel’s desire to reap 30% of the \$225 million settlement pool would be patently unreasonable even without the foregoing mitigating factors. Such a request also violates the longstanding principle that fee awards in mega-fund settlements should be drastically lowered to account for economies of scale. The process begins by selecting the appropriate method for calculating fees under the circumstances presented: lodestar versus percentage-of-the-fund. District courts have discretion “to select the more appropriate method for calculating attorney’s fees in light of the unique characteristics of class actions in general, and of the unique circumstances of the actual cases before them.” *Rawlings v. Prudential-Bache Props., Inc.*, 9 F.3d 513, 516 (6th Cir. 1993). In common fund cases, the award of attorney’s fees need only “be reasonable under the circumstances.” *Id.* However, a district court generally must explain its “reasons for adopting a particular methodology and the factors considered in arriving at the fee.” *Moulton v. U.S. Steel Corp.*, 581 F.3d 344, 352 (6th Cir. 2009) (internal quotation marks omitted).

Upon determining the lodestar, a district court also has discretion to decide whether an upward or downward adjustment is warranted in order to reach a reasonable fee award. *Geier*, 372 F.3d at 792. In considering any adjustment, the Supreme Court has cited with approval twelve factors listed in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714, 717-19 (5th Cir. 1974):

(1) the time and labor required; (2) the novelty and difficulty of the questions; (3) the skill requisite to perform the legal service properly; (4) the preclusion of employment by the attorney due to acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or the circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the attorney; (10) the "undesirability" of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases.

Hensley v. Eckerhart, 461 U.S. 424, 430 n.3, 103 S.Ct. 1933, 76 L.Ed.2d 40 (1983).

Although class counsel's fee petition boasts a "negative" lodestar of .9407, Objectors believe that unnecessary duplication of effort and unreasonably high hourly rates (not to mention unjustified pretrial activities) have inflated class counsel's real contribution. See, *Granzeier v. Middleton*, 173 F.3d 568, 577 (6th Cir. 1999).

Plaintiffs' preference for the percentage approach offers little relief. In such case, the court must utilize those factors articulated by the Sixth Circuit for evaluating the fee request. See *Ramey v. Cincinnati Enquirer, Inc.*, 508 F.2d. 1188, 1196 (6th Cir. 1974). Objectors respectfully submit that the biggest variable affecting the size of the fee is the **size of the settlement**. "To avoid routine windfalls where the recovered fund runs into the multi-millions, courts typically decrease the percentage of the fee as the size of the fund increases." *Precision Associates, Inc. v. Panalpina World Transp. (Holding) Ltd.*, 08-CV-42 JG VVP, 2013 WL 4525323, at *16 (E.D.N.Y. Aug. 27, 2013) (internal quotation marks and citation omitted).

One study found that the percentage awarded for federal class action settlements in 2006 and 2007 "tended to drift lower at a fairly slow pace until a settlement size of \$100 million was reached, at which point the fee percentages plunged well below 20 percent, and by the time \$500 million was reached, they plunged well below 15 percent, with most awards at that level under even 10 percent," though that last category covered only eleven settlements. Brian T. Fitzpatrick, An Empirical Study of Class Action Settlements and Their Fee Awards, 7 J. Empirical L. Stud.

811, 838 (2010). Another study, by Theodore Eisenberg and Geoffrey P. Miller, also showed decreasing percentages as the size of the fund increased. See Theodore Eisenberg and Geoffrey P. Miller, Attorney Fees and Expenses in Class Action Settlements: 1993-2008, 7 J. Empirical L. Stud. 248, 265 (2010). The present case boasts a \$225 million settlement pool. Thus, *it surpasses the threshold for awarding a 20% fee* as a matter of course. When one also considers the unique mitigating factors discussed above, class counsel would be hard pressed to justify a percentage fee award greater than that threshold. Objectors hereby adopt and incorporate all subsequent objections to the proposed settlements and request for attorney's fees filed by other class members.

CONCLUSION

For all of the foregoing reasons, Objectors respectfully request an Order:

1. Denying the parties' joint motion for final approval of the proposed settlements;
2. Reducing class counsel's requested fee award to 20% of the settlement pool;
3. Requiring the parties to provide a reliable and efficient source for linking covered parts with qualified vehicles on the settlement website within 60 days of the Order;
4. Requiring the parties (a) to incorporate a clear procedure for implementing the ALI's safeguards regarding *cy pres* distributions; and (b) to identify several charities whose interests reasonably approximate those of the class; and
5. Requiring the parties to serve an amended Notice of Proposed Class Settlements that incorporates their agreed modifications within 90 days of the Order.

Respectfully Submitted,

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Class Members/Joint Objectors

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was served by registered mail to the following on April 11, 2016, with instructions to file it electronically via CM/ECF, thereby serving by the same means on all counsel of record:

Court	Notice Administrator
U.S. District Court for the Eastern District of Michigan Clerk's Office Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd., Room 564 Detroit, MI 48226	Auto Parts Settlements Objections P.O. Box 10163 Dublin, OH 43017-3163

Olen York
Olen York, Esq.

EXPIRATION DATE			MOTORBOAT/VEHICLE REGISTRATION STATE OF WEST VIRGINIA	
MONTH	DAY	YEAR	CLASS	0026721
06	01	17	A2	08
			W	
RENEWED				
The accompanying boat or plate number is to be used assigned to the addressee for the boat/vehicle described on this card.				
6PC327				

VEHICLE/BOAT IDENTIFICATION NUMBER			TITLE NUMBER	
MAKE	YEAR	LENGTH	WEIGHT	BODY
FORD	2009	3355	CN47686	06/11/09
UT				
			CABE	

YORK, AMY C
15 RIVERVIEW CRT
MILTON

WV 25541

sign on the back

VEHICLE / BOAT / TRAILER IDENTIFICATION NUMBER			TITLE NUMBER	
MAKE	YEAR	LENGTH	WEIGHT	NUMBER AND DATE
FORD	10	2623	CR58861	09/29/09
4D				
CABE				

The owner(s) of the above described vehicle/trailer

YORK, NANCY L.
9 GABLE DR
MILTON WV 25541-8506

dmv
West Virginia
Department of Motor Vehicles

The owner(s) signature must appear on the back of this registration card.

EXHIBIT A - 1

Property Damage:	100	\$119.95	100	\$97.67
Uninsured Motorist:	50/100	\$22.92	50/100	\$22.92
Uninsured Motorist:	25/300	\$4.47	25/300	\$4.47
Property Damage:				
Collision:	500	\$242.71	500	\$214.74
Comprehensive:	0	\$133.54	0	\$135.59
Roadside Help:	50	\$5.80	50	\$5.80
New Car Expanded Protection Coverage:				\$16.40

[View](#)[View](#)

Vehicle Premium : **\$741.31** **\$671.87**

Special Charges**Premiums**

West Virginia Fire And Casualty Premium Surcharge	7.77
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Policy Premium :**\$1,413.18****Discounts Applied**

Discount	2003 TOYOTA COROLLA	2009 FORD TRUCKS ESCAPE
Multi-Car	\$2.55	\$2.55
Anti-Lock Brake	\$63.83	\$55.60
Premier Level 2	\$109.27	\$95.47
Multiple Policy	\$124.95	\$112.72
New Car		\$25.86

Surcharges Applied

None

People

Name	Type	Relation to Primary	Marital Status	Gender	Date Of Birth	
OLEN YORK	Driver	Same	Married and lives with Spouse	Male	11/17/1972	View
AMY YORK	Driver	Spouse	Married and lives with Spouse	Female	06/15/1974	View

Usage

	2003 TOYOTA COROLLA	2009 FORD TRUCKS ESCAPE
Annual Miles:	8,000	8,000
Usage Class:	Work/School	Work/School
Miles One Way:	20	9
Driver Class:	MM11LW	FM11LW
OLEN YORK 11/17/1972 Male Married and lives with Spouse	100 Rated	24
AMY YORK 06/15/1974 Female Married and lives with Spouse	24	100 Rated

Policy Details

Application Date: 02/08/2007

Bind ID:A059198

Application Time: 17:59

Agent of Record: Tom Baldwin (41 59198) Channel of Origin: Agency

Bind Date: 02/08/2007

Channel of Process: Alliance Agency

Bind Time: 17:59

Channel Of Bind: Alliance Agency

Version Number: 34

Buyout: Yes

Policy Rate Control: 992

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HVBoM - Features for VIN : 1FAHP3FN9AW117065

Model Year:	2010	Vehicle Line:	VL AU
Company Car:	N	Vehicle Body/Cab:	FORD FOCUS 4-DR SEDAN SEL
Ordering Country		Vehicle Type	C - Car
Engine Serial Number:	190709202616	Engine Tag Number:	JG170AA
Vehicle Calibration Number:	AAU1BA0A	Production Date:	10-AUG-2009
Warranty Start Date:	12-SEP-2009	Warranty End Date:	
DSO Number:		EUR Paint Code:	
Selling Dealer Code:	02010	Fleet Code:	
Transmission Serial Number:	080992180290	Interior Trim Code:	FS
Exterior Paint Code:	WS	Tu-Tone Paint Code:	

Feature Description Table

Feature Code	Feature Description	
AIR BAG RESTRAINT - DRIVER		
CPGAC	ADVANCD AIR BAG RESTRAINT-DRV	<input type="checkbox"/>
AIR BAG RESTRAINT - PASS		
CPHAD	ADVANCED AIR BAG RESTRNT-PASS	<input type="checkbox"/>
AIR CURTAIN RESTRAINT - LH		
CP1AB	AIR CURTAIN RESTRAINT-LH	<input type="checkbox"/>
AIR CURTAIN RESTRAINT - RH		
CP2AB	AIR CURTAIN RESTRAINT-RH	<input type="checkbox"/>
APPEARANCE PACKAGES		
YPJAL	APPEARANCE PACKAGE	<input type="checkbox"/>
AU -A-C -SURGE		
2XFHB		<input type="checkbox"/>
2XF00	AU -A-C -SURGE	<input type="checkbox"/>
AUDIO - ENTERTAINMENT - IN CAR		
ICED2	GAP SINGLE CD/RAD/MP3 LESS RDS	<input type="checkbox"/>
ICE02	ALL GAP ICE LESS AUDIOPHILE	<input type="checkbox"/>
ICE03	ALL AUDIO UNITS EXC HIGH NAV	<input type="checkbox"/>
AUDIO - RADIO CONTROLS - COLUMN STALK		
IGEAA	LS COLUMN STALK RADIO CONTROLS	<input type="checkbox"/>
AUDIO - RADIO RECEPTION EQUIPMENT		
IBBAB	SATELLITE RADIO RECEPT-AUDIO	<input type="checkbox"/>
AXLE - FINAL DRIVE RATIO - SINGLE SPEED		
EGAFJ	3.34 FINAL DRIVE RATIO	<input type="checkbox"/>
EGA01	ALL SINGLE SPD FINAL DR RATIOS	<input type="checkbox"/>
BODY STYLE		
BS FC	4 DOOR SEDAN-6 LITE	<input type="checkbox"/>
BS 0A	ALL 4 DOOR 6 LITE SEDANS	<input type="checkbox"/>
BS 0B	ALL 4DR/WAGON	<input type="checkbox"/>

EXHIBIT A-3

BS 0C	ALL SEDANS/HATCHBACKS	<input type="checkbox"/>	
BS 0E	ALL 2DR COUPE/4DR SEDAN-6 LITE	<input type="checkbox"/>	
BS 03	ALL SEDANS	<input type="checkbox"/>	
BS 06	ALL SEDANS/WAGONS/VANS	<input type="checkbox"/>	
BS 07	ALL SEDANS/WAGONS	<input type="checkbox"/>	
BS 09	ALL 4/5 DOOR SEDANS/WAGON	<input type="checkbox"/>	
BS 10	ALL 4 DOOR SEDANS/MAV	<input type="checkbox"/>	
BRAKES - ANTI-LOCK			
FEAAB	4 WHL ANTI-LOCK BRAKES	<input type="checkbox"/>	
BRAKES - PARKING BRAKE GRIP			
FAFAC	SOFTFEEL HANDBRAKE GRIP	<input type="checkbox"/>	
BUMPER - FRONT			
CLFGF	FRT BMP-PLASTIC-BODY COLOR	<input type="checkbox"/>	
BUMPER - REAR			
CLMAK	REAR BUMPER-PLASTIC-BODY COLOR	<input type="checkbox"/>	
CARGO ORGANIZER - FORD INVOICED ACCESSOR			
FHBAA	LESS CARGO ORGANIZER-FIA	<input type="checkbox"/>	
CARGO TRAY - FORD INVOICED ACCESSORIES			
FIQAA	LESS CARGO TRAY-FIA	<input type="checkbox"/>	
CLIMATE - AIR CONDITIONING			
AC B	MANUAL AIR CONDITIONER	<input type="checkbox"/>	
AC 1	ALL AIR CONDITIONING	<input type="checkbox"/>	
CLIMATE - AIR REGISTER			
G1GAB	AIR REGISTER - BASE	<input type="checkbox"/>	
DRIVE			
DR A	2 WHL L/H FRONT DRIVE	<input type="checkbox"/>	
DR T	ALL 2 WHEEL LEFT HAND DRIVE	<input type="checkbox"/>	
DR 1	ALL LEFT HAND DRIVE	<input type="checkbox"/>	
DR 2	ALL 2 WHEEL DRIVE	<input type="checkbox"/>	
DR 5	ALL FRONT WHEEL DRIVE	<input type="checkbox"/>	
DRIVER CONVENIENCE			
YQLAA	LESS DRIVER CONVENIENCE PKG	<input type="checkbox"/>	
ENGINE			
EN H4	2.0L 91 RON DURATEC HE	<input type="checkbox"/>	
EN 0G	ALL GAS/GASEOUS ENGINES	<input type="checkbox"/>	
EN 0S	ALL NON-TURBO ENGINES	<input type="checkbox"/>	
EN 04	ALL 4 CYLINDER GAS ENGINES	<input type="checkbox"/>	
EN 09	ALL 4 AND 5 CYLINDER ENGINES	<input type="checkbox"/>	
EN 1H	ALL NON 3.5L ENGINES	<input type="checkbox"/>	
EN 20	ALL 2.0L GAS ENGINES	<input type="checkbox"/>	
EN 38	ALL MAZDA 14-NON BZ-ENGINES	<input type="checkbox"/>	
EN 52	ALL GAS NON FLEX FUEL ENGINES	<input type="checkbox"/>	
EN 8A	ALL ENG EXCLUDING 2.2L DIESEL	<input type="checkbox"/>	

EN 8B	ALL ENG EXCL 2.2L DSL 5CYL G	<input type="checkbox"/>
	ENGINE - EMISSION REQUIREMENTS	<input type="checkbox"/>
DGAAB	49 STATE/NON GREEN STATE REQ.	<input type="checkbox"/>
	ENGINE - EVAPORATIVE EMISSIONS	<input type="checkbox"/>
DGBAA	LESS EVAPORATIVE EMISSIONS	<input type="checkbox"/>
	ENGINE - HEATER	<input type="checkbox"/>
DEBAA	LESS IMMERSION HEATER	<input type="checkbox"/>
	EXHAUST PIPE EXTENSION	<input type="checkbox"/>
F5BAA	LESS EXHAUST PIPE EXTENSION	<input type="checkbox"/>
	EXHAUST SYSTEMS	<input type="checkbox"/>
F2AAB	DUAL EXHAUST SYSTEM	<input type="checkbox"/>
	EXHAUST TIPS - FORD INVOICED ACCESSORIES	<input type="checkbox"/>
FIEAA	LESS EXHAUST TIPS-FIA	<input type="checkbox"/>
	EXTERIOR - DOOR HANDLE	<input type="checkbox"/>
CAAAE	EXT DOOR HANDLE-SELF COLOURED	<input type="checkbox"/>
	EXTERIOR PAINT - 2003/04/05/06 EXTERIOR	<input type="checkbox"/>
PN3JD	WHITE SUEDE	<input type="checkbox"/>
	FLEET	<input type="checkbox"/>
YZKAA	RETAIL/STOCK	<input type="checkbox"/>
	FRONT - FASCIA	<input type="checkbox"/>
A3CAB	FRONT FASCIA-LEVEL 1	<input type="checkbox"/>
	FRONT FENDER GILL	<input type="checkbox"/>
A2RAA	LESS FRT FENDER GILL	<input type="checkbox"/>
	FUEL - ASSEMBLY PLANT FUEL FILL	<input type="checkbox"/>
FF1AB	NORMAL FUEL FILL	<input type="checkbox"/>
	FUEL ENGINE FUEL CAPABILITY	<input type="checkbox"/>
GBVAF	UNLEADED FUEL CAPABILITY	<input type="checkbox"/>
GBV01	ALL NON FLEX FUEL CAPABILITY	<input type="checkbox"/>
GBV02	ALL GASOLINE FUEL CAPABILITY	<input type="checkbox"/>
	FUEL TANK LOCK	<input type="checkbox"/>
GBTAB	NON LOCKING FUEL CAP	<input type="checkbox"/>
	GRILLE - FRONT	<input type="checkbox"/>
BLDAB	CHROME GRILLE	<input type="checkbox"/>
	GVWS	<input type="checkbox"/>
AAZWJ	3715 LB. GVW	<input type="checkbox"/>
AAZ01	0 LB THRU 4580 LB GVW	<input type="checkbox"/>
AAZ06	0 LB THRU 8600 LB GVW	<input type="checkbox"/>
	HOOD DEFLECTOR - FORD INVOICED ACCESSORI	<input type="checkbox"/>
FICAA	LESS HOOD DEFLECTOR-FIA	<input type="checkbox"/>
	I/P INSERT	<input type="checkbox"/>
BBQAK	I/P INSERT - BLACK	<input type="checkbox"/>
	INSTRUMENTATION - DISPLAYS - COMPASS	<input type="checkbox"/>
HJFAA	LESS COMPASS DISPLAY	<input type="checkbox"/>
	INSTRUMENTATION - MESSAGE CENTER	<input type="checkbox"/>

HKDAB	MESSAGE CENTER	<input type="checkbox"/>
	INSTRUMENTATION - SPEEDOMETERS	<input type="checkbox"/>
HDHAB	MPH/KPH SPEEDOMETER	<input type="checkbox"/>
	INSTRUMENTATION - TYPE	<input type="checkbox"/>
HCAAJ	HIGH SERIES ANALOG CLUSTER	<input type="checkbox"/>
	INTERIOR DOOR HANDLES	<input type="checkbox"/>
BCFAG	DOOR HANDLES-INSIDE MIC	<input type="checkbox"/>
	INTERIOR FLOOR MATS - FORD INVOICED ACCE	<input type="checkbox"/>
FIDAA	LESS FLOOR MATS-FIA	<input type="checkbox"/>
	INTERIOR TRIM COLORS - ALL	<input type="checkbox"/>
000HB	MEDIUM STONE	<input type="checkbox"/>
	LABELS - SPECIAL LANGUAGE	<input type="checkbox"/>
AEAAE	ENGLISH LANGUAGE LABEL	<input type="checkbox"/>
	LAMPS - FOG LAMPS - FORD INVOICED ACCESS	<input type="checkbox"/>
FHAAA	LESS FOG LAMPS-FIA	<input type="checkbox"/>
	LAMPS - FRONT FOG	<input type="checkbox"/>
JBKAB	FRONT FOG LAMPS	<input type="checkbox"/>
	LAMPS - HEADER LIGHTS - INTERIOR MAP	<input type="checkbox"/>
JCFAC	HEADER MNT COURTESY/2 MAPLIGHT	<input type="checkbox"/>
	LAMPS - HEADLAMPS - DESIGN	<input type="checkbox"/>
JBBAE	HEADLAMPS - LEVEL 1	<input type="checkbox"/>
	LAMPS - HEADLAMPS - RUNNING	<input type="checkbox"/>
JBCAA	LESS DAYTIME RUNNING LAMPS	<input type="checkbox"/>
	LAMPS - INTERIOR LIGHT GROUP	<input type="checkbox"/>
JCBAA	LESS INTERIOR LIGHT GROUP	<input type="checkbox"/>
	LAMPS - LOAD COMPARTMENT LIGHT	<input type="checkbox"/>
JCMAB	LOAD COMPARTMENT LIGHT	<input type="checkbox"/>
	LAMPS - TAILLAMPS	<input type="checkbox"/>
JDAAB	TAILLAMPS-LEVEL 1	<input type="checkbox"/>
	LOCKS - DOOR	<input type="checkbox"/>
CBAAB	POWER DOOR LOCKS	<input type="checkbox"/>
	LOCKS - DOOR ENTRY REMOTE CNTR UNIT	<input type="checkbox"/>
CBFAB	DOOR ENTRY REMOTE CNTR UNIT	<input type="checkbox"/>
	LOCKS - TWO STEP DOOR UNLOCK SYSTEM	<input type="checkbox"/>
CBCAG	CRASH UNLOCKING SYSTEM	<input type="checkbox"/>
	LUXURY & CONVENIENCE PACKAGE	<input type="checkbox"/>
YPDZZ	NO POS SEL FROM THIS FAMILY	<input type="checkbox"/>
	MARKET DERIVATIVE	<input type="checkbox"/>
MD F	FORD DIVISION DERIVATIVE	<input type="checkbox"/>
MD 1	FORD & MERCURY MRKT DERIVATIVE	<input type="checkbox"/>
	MARKETING BODY CODE	<input type="checkbox"/>
YBCPE	MRKTG BODY CODE-P3F	<input type="checkbox"/>
	MEDIA GATEWAY MODULE (MGM)	<input type="checkbox"/>
IEVAA	LESS MEDIA GATEWAY MODULE	<input type="checkbox"/>
	MIRROR EC COMPASS - FORD INVOICED ACCE	<input type="checkbox"/>

FHCAA	LESS EC COMPASS MIRROR-FIA	<input type="checkbox"/>
	MIRROR - EXTERIOR DRIVER	
BSDAD	DRIVER POWER MIRROR	<input type="checkbox"/>
BSDOP	ALL POWER EXTR DRIVER MIRRORS	<input type="checkbox"/>
BSD01	ALL MANUAL FOLD MIRRORS-DRV	<input type="checkbox"/>
	MIRROR - EXTERIOR FINISH	
BSLAB	EXT MIRROR FINISH-BLACK	<input type="checkbox"/>
	MIRROR - EXTERIOR PASSENGER	
BSFAD	PASS POWER CONVEX MIRROR	<input type="checkbox"/>
BSF0P	ALL POWER EXTR PASS MIRRORS	<input type="checkbox"/>
	MIRROR - INTERIOR REAR VIEW	
BSBAB	DAY/NIGHT INSIDE MIRROR	<input type="checkbox"/>
	MOON AND TUNE PACKAGES	
YQDAA	LESS MOON AND TUNE PACKAGE	<input type="checkbox"/>
	OWNER HAND BOOK PACK	
AEDAB	OWNER HAND BOOK PACK	<input type="checkbox"/>
	PLANT BUILD REQUIREMENTS	
AAGAZ	WAYNE PLANT BUILD	<input type="checkbox"/>
	PROGRAM CONTROL	
AD6HA	2010 JOB #1 PROGRAM CONTROL	<input type="checkbox"/>
	REAR END FASCIA	
A1LAB	REAR END FASCIA-LEVEL 1	<input type="checkbox"/>
	REMOTE STARTER - FORD INVOICED ACCESSORY	
FIVAA	LESS REMOTE STARTER-FIA	<input type="checkbox"/>
	RESTRAINT DEVICE PACKAGES	
CN7AF	BLT W/D&P FRNT/1&2 ROW RSTRNT	<input type="checkbox"/>
	ROOF - OPENING PANELS	
CHAAA	LESS ROOF OPENING PANELS	<input type="checkbox"/>
	SEAT - DRIVER SEAT AIR BAG RESTR	
CPMAB	DRIVER SEAT AIR BAG RESTRAINT	<input type="checkbox"/>
	SEAT - FRONT SEAT TYPE	
FS A	SEAT-SPORT-DRV/PASS	<input type="checkbox"/>
	SEAT - PASS SEAT AIR BAG RESTR	
CPNAB	PASS SEAT AIR BAG RESTR	<input type="checkbox"/>
	SEAT - TEMP CONTROLLED DRIVER	
BY1AA	LESS TEMP CONTROL DRIVER SEAT	<input type="checkbox"/>
	SEAT - TEMP CONTROLLED PASSENGER	
BY2AA	LESS TEMP CONTROL PASSNGR SEAT	<input type="checkbox"/>
	SEATS - DRIVER TIP/SLIDE	
BVMAA	LESS DRIVER TIPPING/SLIDE SEAT	<input type="checkbox"/>
	SEATS - MRKT CB-TEMP CONTR ST-DRV/PASS	
YCLAA	LESS MK CB-TEMP CONTR ST-DR/PA	<input type="checkbox"/>
	SECURITY SYSTEMS	
HNAAD	PERIMETER ANTI-THEFT	<input type="checkbox"/>
	SHIFTING AIDS	

IWAAA	LESS SHIFT INDIC LIGHT	<input type="checkbox"/>
	SMOKERS PACKAGE	<input type="checkbox"/>
J3CAA	LESS SMOKERS PACKAGE	<input type="checkbox"/>
	SPECIAL BUILD REQUIREMENTS	<input type="checkbox"/>
SBRAA	LESS SPECIAL BUILD REQUIREMENT	<input type="checkbox"/>
	SPEED CONTROL	<input type="checkbox"/>
GTDAB	SPEED CONTROL	<input type="checkbox"/>
	SPOILER - REAR	<input type="checkbox"/>
BPFAB	SINGLE WING REAR SPOILER	<input type="checkbox"/>
	SPRING - COIL LEFT FRONT	<input type="checkbox"/>
TAAQ6	8S43 5310 C* L/F COIL	<input type="checkbox"/>
	SPRING - COIL LEFT REAR	<input type="checkbox"/>
TAETQ	8S43-5B669-F* L/R COIL (CAR)	<input type="checkbox"/>
	SPRING - COIL RIGHT FRONT	<input type="checkbox"/>
TACQ6	8S43 5310 C* R/F COIL	<input type="checkbox"/>
	SPRING - COIL RIGHT REAR	<input type="checkbox"/>
TAGTQ	8S43-5B669-F* R/R COIL (CAR)	<input type="checkbox"/>
	STAR RATING PERF LEVEL	<input type="checkbox"/>
A5MAB	STAR RATING PERF LEVEL 1	<input type="checkbox"/>
	STEERING AIDS	<input type="checkbox"/>
GPAAB	POWER STEERING-FIXED RATIO	<input type="checkbox"/>
GPA01	ALL POWER STEERING	<input type="checkbox"/>
	STEERING WHEEL	<input type="checkbox"/>
GTAAB	STEERING WHEEL-BASE	<input type="checkbox"/>
	SUSPENSION	<input type="checkbox"/>
DWAAF	STANDARD DUTY SUSPENSION	<input type="checkbox"/>
	SUSPENSION - SHOCK ABSORBERS - REAR	<input type="checkbox"/>
D1GAB	STANDARD DUTY REAR SHOCK ABS	<input type="checkbox"/>
	SUSPENSION - STABILIZER BAR - FRONT	<input type="checkbox"/>
DYKAB	FRONT STABLIZER BAR	<input type="checkbox"/>
	SUSPENSION - STABILIZER BAR - REAR	<input type="checkbox"/>
DZLAA	LESS REAR STABLIZER BAR	<input type="checkbox"/>
	TERRITORIES - GENERIC COUNTRY GROUPINGS	<input type="checkbox"/>
SATAB	GENERIC COUNTRY GROUP 1	<input type="checkbox"/>
	TERRITORIES - NORTH AMERICA PRINCIPLE	<input type="checkbox"/>
WANAB	USA	<input type="checkbox"/>
WAN01	ALL U.S.A. AND CANADA	<input type="checkbox"/>
WAN02	USA,USA TERR,CAN,MEX	<input type="checkbox"/>
WAN03	ALL USA AND MEXICO	<input type="checkbox"/>
	TIRE SPARE	<input type="checkbox"/>
D3MA1	SPARE TIRE-T125/80D15	<input type="checkbox"/>
	TIRES - 15 INCH	<input type="checkbox"/>
D3GBB	P195/60R 15T BSW (87T)	<input type="checkbox"/>
	TPO/ORDER CODES 0-300	<input type="checkbox"/>
YZBBA	TPO/ORDER CODE 200A	<input type="checkbox"/>

TRANSMISSION	
TR D2	4 SPD AUTO VANDYKE FN TRANS
TR 0A	ALL AUTOMATIC TRANSMISSIONS
TR 13	ALL AUTOMATIC TRANSAXLE TRANS
TR 24	ALL 4 SPD AUTO TRANSMISSIONS
TRANSMISSION GEAR SETS	
FJGCK	2.80/1.49/1.00/0.73
TRANSMISSION GEARSHIFT KNOB	
CAEBH	GEARSHIFT KNOB - CHROME ACCENT
VALUE PACKAGES	
YPEAA	LESS VALUE PACKAGE
VEHICLE LINE/LEVEL	
VL AU	FOCUS (CW170) - N.A.
VERSION	
VS CE	SE VERSION - CAR
WHEEL - SPARE	
D17AH	SPARE WHEEL-MINI STEEL
D1702	ALL MINI SPARE WHEELS
WHEEL COVERS	
D5AAA	LESS WHEEL COVERS
WHEEL SIZE/STYLE - 15 INCH	
D2SCV	6X15 MACH ALLOY W/PNTEO POCKET
D2S02	6.0 X 15 SUMMARY
WHEELBASE	
A2WAK	103 CAR WHEELBASE
WINDOW/PANEL - RR QRTR VENT	
B2FAA	LESS REAR QUARTER VENT WINDOW
WINDOWS - FRONT SIDE	
B2CAE	PWR FRT WINDOWS ONE TOUCH DOWN
WINDOWS - REAR SIDE	
B2DAC	POWER REAR SIDE WINDOW

REQUESTOR : M-DEFLUM

HVBoM

FORD PROPRIETARY, TRANSIENT

ROWS RETURNED : 281
 TIMESTAMP : 17-Mar-2016 2:53:14
 PM
 RETENTION: NONE

TOP

HVBoM - Features for VIN : 1FMCU03739KA59048

Model Year:	2009	Vehicle Line:	VL M7
Company Car:	N	Vehicle Body/Cab:	FORD ESCAPE 4-DR XLT 4X2
Ordering Country		Vehicle Type	T - Truck
Engine Serial Number:	090908214111	Engine Tag Number:	9G316AA
Vehicle Calibration Number:	9M71A20A	Production Date:	15-OCT-2008
Warranty Start Date:	23-MAY-2009	Warranty End Date:	
DSO Number:		EUR Paint Code:	
Selling Dealer Code:	01991	Fleet Code:	
Transmission Serial Number:	088283076113	Interior Trim Code:	29
Exterior Paint Code:	U1	Tu-Tone Paint Code:	

Feature Description Table

Feature Code	Feature Description	
AIR BAG RESTRAINT - DRIVER		
CPGAB	AIR BAG RESTRAINT-DRIVER	<input type="checkbox"/>
AIR BAG RESTRAINT - PASS		
CPHAB	AIR BAG RESTRAINT-PASS	<input type="checkbox"/>
AMENITIES PACKAGE		
YQZAA	LESS AMENITIES PACKAGE	<input type="checkbox"/>
ANTI THEFT SYSTEM - FORD INVOICED ACCESS		
FHXAA	LESS ANTI THEFT SYSTEM - FIA	<input type="checkbox"/>
AUDIO - RADIO ANTENNA		
ICDAV	SATELLITE ANTENNA (SDARS)	<input type="checkbox"/>
AUDIO - RADIO CONTROLS - AUTO VOLUME		
IGHAA	LESS RADIO CONTROL AUTO VOLUME	<input type="checkbox"/>
AUDIO - RADIO FREQUENCY		
IBMAB	NAAO RADIO FREQUENCY	<input type="checkbox"/>
AUDIO - RADIO RECEPTION EQUIPMENT		
IBBAB	SATELLITE RADIO RECEPT-AUDIO	<input type="checkbox"/>
AUDIO - RADIO SPEAKERS		
IDBAC	4 RADIO SPEAKERS	<input type="checkbox"/>
AUDIO - RADIOS		
IBAAZ	ELET R AM/FM STRO/DISC/CLK	<input type="checkbox"/>
IBA00	ALL RADIOS	<input type="checkbox"/>
IBA02	ALL NON CASSETTE RADIOS	<input type="checkbox"/>
IBA03	ALL STEREO RADIOS	<input type="checkbox"/>
IBA05	ALL RADIOS WITH CD PLAYER	<input type="checkbox"/>
IBA06	ALL RADIOS WITHOUT NAVIGATION	<input type="checkbox"/>
AUDIO PACKAGE		
YPNAA	LESS AUDIO PACKAGE	<input type="checkbox"/>
AXLE - FINAL DRIVE RATIO - SINGLE SPEED		

EXHIBIT A-4

EGAAG	2.93 FINAL DRIVE RATIO	<input type="checkbox"/>
EGA01	ALL SINGLE SPD FINAL DR RATIOS	<input type="checkbox"/>
BRAKES - ANTI-LOCK		
FEAAB	4 WHL ANTI-LOCK BRAKES	<input type="checkbox"/>
BRAKES - HEV REGENERATIVE BRAKE SYSTEM		
FAKAA	LESS HEV REGEN BRAKE SYSTEM	<input type="checkbox"/>
BUMPER - PROXIMITY SENSOR		
HLHAA	LESS PROXIMITY SENSOR	<input type="checkbox"/>
BUMPER AND FASCIA PACKAGE		
CL9AA	LESS BUMPER/FASCIA PACK	<input type="checkbox"/>
CAB STYLE		
CA WE	5 DOOR LIGHT TRUCK	<input type="checkbox"/>
CARGO AREA COVER		
BDCAB	CARGO AREA COVER	<input type="checkbox"/>
CARGO PACKAGE		
YP4AB	CARGO PACKAGE	<input type="checkbox"/>
CARGO STOW RACK		
BDSAD	CARGO AREA MGMT SYSTEM LEVEL 1	<input type="checkbox"/>
CARGO TRAY - FORD INVOICED ACCESSORIES		
FIQAA	LESS CARGO TRAY-FIA	<input type="checkbox"/>
CENTER PANEL - FINISH		
B57AG	CENTER PANEL-GHIN RIME	<input type="checkbox"/>
CLIMATE - AIR CONDITIONING		
AC B	MANUAL AIR CONDITIONER	<input type="checkbox"/>
AC 1	ALL AIR CONDITIONING	<input type="checkbox"/>
CLIMATE - AIR REGISTER		
G1GAB	AIR REGISTER - BASE	<input type="checkbox"/>
COLD WEATHER GROUP		
ABCAA	LESS COLD WEATHER GROUP	<input type="checkbox"/>
COMFORT PACK		
J5XAA	LESS COMFORT PACK	<input type="checkbox"/>
CONSOLE - OVERHEAD		
B5VAL	OVERHEAD CONSOLE-2 SUNGLS BINS	<input type="checkbox"/>
CONSOLE - UNIQUE CONSOLE TOP PLATE		
B5SAE	CONSOLE TOP PLATE-METALLIC	<input type="checkbox"/>
CONVENIENCE GROUP		
AAMAB	CONVENIENCE GROUP	<input type="checkbox"/>
DOOR SWITCHPACK FINISHER		
BAZAZ	DR SP FNSH-FR-GHIN RIME/RR-MIC	<input type="checkbox"/>
BAZ02	ANY MIC DR SWTCHPACK FINISHERS	<input type="checkbox"/>
DRIVE		
DR A	2 WHL L/H FRONT DRIVE	<input type="checkbox"/>
DR T	ALL 2 WHEEL LEFT HAND DRIVE	<input type="checkbox"/>
DR 1	ALL LEFT HAND DRIVE	<input type="checkbox"/>
DR 2	ALL 2 WHEEL DRIVE	<input type="checkbox"/>

DR 5	ALL FRONT WHEEL DRIVE	<input type="checkbox"/>
	DVD PACK - FORD INVOICED ACCESSORIES	<input type="checkbox"/>
FI2AA	LESS DVD PACK-FIA	<input type="checkbox"/>
	ELECTRICAL OUTLET	<input type="checkbox"/>
J3AAA	LESS ELECTRICAL OUTLET	<input type="checkbox"/>
	ENGINE	<input type="checkbox"/>
EN S7	2.5L DOHC PFI 4 CYL GAS	<input type="checkbox"/>
EN 0G	ALL GAS/GASEOUS ENGINES	<input type="checkbox"/>
EN 04	ALL 4 CYLINDER GAS ENGINES	<input type="checkbox"/>
EN 09	ALL 4 AND 5 CYLINDER ENGINES	<input type="checkbox"/>
	ENGINE - EMISSION REQUIREMENTS	<input type="checkbox"/>
DGABG	TIER 2 BIN 5 - MFC	<input type="checkbox"/>
	ENGINE - HEATER	<input type="checkbox"/>
DEBAA	LESS IMMERSION HEATER	<input type="checkbox"/>
	ENGINE - STARTER/CLUTCH INTERLOCK	<input type="checkbox"/>
DEHAA	LS START/CLUTCH PEDAL INTERLOC	<input type="checkbox"/>
	EXCLUSIVE PACK	<input type="checkbox"/>
AB4AA	LESS EXCLUSIVE PACK	<input type="checkbox"/>
	EXTERIOR - DOOR HANDLE	<input type="checkbox"/>
CAAAB	EXTERIOR DOOR HANDLE-BLACK	<input type="checkbox"/>
	EXTERIOR APPEARANCE GROUP	<input type="checkbox"/>
AB2AA	LESS APPEARANCE GROUP	<input type="checkbox"/>
	EXTERIOR PAINT - 2003/04/05/06 EXTERIOR	<input type="checkbox"/>
PN3KT	SPORT BLUE METALLIC	<input type="checkbox"/>
	FEATURE CONTENT GROUP	<input type="checkbox"/>
AD2AB	FEATURE CONTENT GROUP 1	<input type="checkbox"/>
	FLEET	<input type="checkbox"/>
YZKAA	RETAIL/STOCK	<input type="checkbox"/>
	FLOOR MATS - INTERIOR FRONT	<input type="checkbox"/>
BBHAB	FRONT THROW IN CARPET FLR MATS	<input type="checkbox"/>
	FLOOR MATS - INTERIOR REAR	<input type="checkbox"/>
BBIAB	REAR THROW IN CARPET FLR MATS	<input type="checkbox"/>
	FLOOR MATS LEVEL 2 - FORD INVOICED ACCES	<input type="checkbox"/>
FHEAA	LESS FLOOR MATS LEVEL 2-FIA	<input type="checkbox"/>
	FTO PACKAGE	<input type="checkbox"/>
YQ6AA	LESS FTO PACKAGE	<input type="checkbox"/>
	FUEL - ASSEMBLY PLANT FUEL FILL	<input type="checkbox"/>
FF1AB	NORMAL FUEL FILL	<input type="checkbox"/>
	FUEL ENGINE FUEL CAPABILITY	<input type="checkbox"/>
GBVAF	UNLEADED FUEL CAPABILITY	<input type="checkbox"/>
GBV01	ALL NON FLEX FUEL CAPABILITY	<input type="checkbox"/>
GBV02	ALL GASOLINE FUEL CAPABILITY	<input type="checkbox"/>
	FUEL KIT - FORD INVOICED ACCESSORIES	<input type="checkbox"/>
FHHAA	LESS FUEL KIT	<input type="checkbox"/>
	FUEL LABEL	<input type="checkbox"/>

B1BAB	BP FUEL LABEL	<input type="checkbox"/>
	FUEL TANK LOCK	<input type="checkbox"/>
GBTAG	NON LOCKING CAPLESS FUEL FILL	<input type="checkbox"/>
	FUEL TANKS	<input type="checkbox"/>
GBAAB	SINGLE FUEL TANK	<input type="checkbox"/>
	GEARCHANGE LEVER SURROUND	<input type="checkbox"/>
HCKAE	CHROME SURROUND	<input type="checkbox"/>
	GRILLE - FRONT	<input type="checkbox"/>
BLDC7	GRILLE-BRIGHT UPPER/BC LOWER	<input type="checkbox"/>
GVWS		<input type="checkbox"/>
AAZBU	4440 LB. GVW	<input type="checkbox"/>
AAZ01	0 LB THRU 4580 LB GVW	<input type="checkbox"/>
AAZ06	0 LB THRU 8600 LB GVW	<input type="checkbox"/>
	HORNS - ELECTRICAL	<input type="checkbox"/>
HIAAA	LESS ELECTRIC HORN	<input type="checkbox"/>
	INFORMATION PACKAGE	<input type="checkbox"/>
YQXAA	LESS INFO/TECH PACKAGE	<input type="checkbox"/>
	INSTRUMENTATION - DISPLAYS - COMPASS	<input type="checkbox"/>
HJFAB	COMPASS DISPLAY	<input type="checkbox"/>
	INSTRUMENTATION - MESSAGE CENTER	<input type="checkbox"/>
HKDAB	MESSAGE CENTER	<input type="checkbox"/>
	INSTRUMENTATION - NAVIGATION CENTER	<input type="checkbox"/>
HKCAA	LESS NAVIGATION CENTER	<input type="checkbox"/>
	INSTRUMENTATION - SPEEDOMETERS	<input type="checkbox"/>
HDHAB	MPH/KPH SPEEDOMETER	<input type="checkbox"/>
	INSTRUMENTATION - TIRE INFLATION MONITOR	<input type="checkbox"/>
HJCAB	TIRE INFLATION MONITOR	<input type="checkbox"/>
	INTERIOR DOOR HANDLES	<input type="checkbox"/>
BCFAG	DOOR HANDLES-INSIDE MIC	<input type="checkbox"/>
	INTERIOR DOOR TRIM PANEL INSERT	<input type="checkbox"/>
BCLET	DOOR TRIM PNL INSERT-ECO	<input type="checkbox"/>
	INTERIOR FLOOR MATS - FORD INVOICED ACCE	<input type="checkbox"/>
FIDAA	LESS FLOOR MATS-FIA	<input type="checkbox"/>
	INTERIOR TRIM COLORS - ALL	<input type="checkbox"/>
000Y9	CHARCOAL	<input type="checkbox"/>
	INTERIOR TRIM PACKS	<input type="checkbox"/>
ABBAE	LESS TRIM PACK	<input type="checkbox"/>
	LABELS - SPECIAL LANGUAGE	<input type="checkbox"/>
AEAAE	ENGLISH LANGUAGE LABEL	<input type="checkbox"/>
	LAMPS - FRONT FOG	<input type="checkbox"/>
JBKAB	FRONT FOG LAMPS	<input type="checkbox"/>
	LAMPS - HEADER LIGHTS - ROOF	<input type="checkbox"/>
JCGAB	DOME MAPLIGHT	<input type="checkbox"/>
	LAMPS - HEADLAMP CONTROL	<input type="checkbox"/>
JEDAC	AUTOMATIC HEADLAMP CONTROL OFF	<input type="checkbox"/>

LAMPS - HEADLAMPS - RUNNING	
JBCAA	LESS DAYTIME RUNNING LAMPS
LAMPS - INTERIOR LIGHT GROUP	
JCBAA	LESS INTERIOR LIGHT GROUP
LAMPS - SIDE FLASHERS	
JBGAA	LESS SIDE REPEAT FLASHERS
LICENSE PLATE BRACKET - FRONT	
CLVAB	FRT LICENSE PLATE BRKT/HOLDER
LOCK - KEY/BRAKE/GEAR SHIFT LOCK	
FLSAC	KEY/BRK/GEAR SHFT/LOC-ELEC MEC
LOCK - LIFTGATE/TAILGATE HANDLE - EXTERI	
CACAH	LIFT/DECKLID HNDL EXT- A-GLOSS
LOCKS - DOOR ENTRY REMOTE CNTR UNIT	
CBFAE	ILLUMINATED DOOR ENTRY KEYPAD
LUXURY PACK	
J5LAA	LESS LUXURY PACK
MARKETING BODY CODE	
YBCEQ	MRKTG BODY CODE-U03
MEDIA GATEWAY MODULE (MGM)	
IEVAA	LESS MEDIA GATEWAY MODULE
MIRROR - EXTERIOR DRIVER	
BSDB8	DRV MANUAL FOLD, POWER ADJUST
MIRROR - EXTERIOR FINISH	
BSLAE	EXT MIRRORS MOULDED-IN COLOR
MIRROR - EXTERIOR PASSENGER	
BSFB8	PASS MANUAL FOLD, POWER ADJUST
MIRROR - INTERIOR REAR VIEW	
BSBAF	ELECTROCHROMIC INSIDE MIRROR
MOON AND TUNE PACKAGES	
YQDAA	LESS MOON AND TUNE PACKAGE
MOULDINGS - EXTERIOR ROCKER PANEL	
BMDAH	ROCKER PANEL MLD-BODY COLOR
M7 -B-C -HIGH-FORD	
5T2Y9	
5T200	M7 -B-C -HIGH-FORD
OWNER HAND BOOK PACK	
AEDAB	OWNER HAND BOOK PACK
PLANT BUILD REQUIREMENTS	
AAGAJ	KANSAS CITY PLANT BUILD
PREMIUM GROUP	
ADRAA	LESS PREMIUM GROUP
PROGRAM CONTROL	
AD6GA	2009 JOB #1 PROGRAM CONTROL
REMOTE STARTER - FORD INVOICED ACCESSORY	
FIVAA	LESS REMOTE STARTER-FIA

	ROOF - OPENING PANELS	
CHAAA	LESS ROOF OPENING PANELS	<input type="checkbox"/>
	ROOF RACK	
BLYAB	ROOF RACK INCLUDING CROSSBARS	<input type="checkbox"/>
BLY01	ALL ROOF RACKS	<input type="checkbox"/>
	SALES BADGE	
AB5AA	LESS SALES BADGE	<input type="checkbox"/>
	SALES FEATURE CODE-LEVEL 1	
AC1AA	LESS SALES FEATURE - LEVEL 1	<input type="checkbox"/>
	SEAT - DRIVER SEAT BACK MTD MAP POCKET	
BU6AB	DRV SEAT BACK MTD MAP POCKET	<input type="checkbox"/>
	SEAT - FRONT SEAT TYPE	
FS B	SEAT-INDIVIDUAL-L/B DRV/PASS	<input type="checkbox"/>
	SEAT - PASS SEAT BACK MTD MAP POCKET	
BU7AB	PASS SEAT BACK MTD MAP POCKET	<input type="checkbox"/>
	SEAT - TEMP CONTROLLED DRIVER	
BY1AA	LESS TEMP CONTROL DRIVER SEAT	<input type="checkbox"/>
	SEAT - TEMP CONTROLLED PASSENGER	
BY2AA	LESS TEMP CONTROL PASSNGR SEAT	<input type="checkbox"/>
	SEAT ADJUSTER - DRIVER	
BYPAC	POWER 6-WAY DRIVER SEAT ADJUST	<input type="checkbox"/>
	SEATS - LUMBAR SEAT SUPT - L/H SIDE	
BVUAA	LESS L/H SIDE LUMBAR SEAT SUPT	<input type="checkbox"/>
	SEATS - SECOND ROW SEATING	
BYBA1	2ND ROW - SPLIT BENCH 2 PASS	<input type="checkbox"/>
	SERIES	
SE EF	FORD SERIES	<input type="checkbox"/>
	SMOKERS PACKAGE	
J3CAA	LESS SMOKERS PACKAGE	<input type="checkbox"/>
	SPECIAL EQUIPMENT PACKAGES	
AALAA	LESS SPECIAL EQUIPMENT PACKAGE	<input type="checkbox"/>
	SPECIAL VALUE PACK	
ABEAA	LESS SPECIAL VALUE PACKAGES	<input type="checkbox"/>
	SPEED CONTROL	
GTDAB	SPEED CONTROL	<input type="checkbox"/>
	SPRING - COIL LEFT FRONT	
TAAQ8	9L84 5310 B L/F COIL	<input type="checkbox"/>
	SPRING - COIL RIGHT FRONT	
TACQY	9L84 5310 B R/F COIL	<input type="checkbox"/>
	SPRING - LEAF LEFT REAR	
TAJD8	9L84 5726 A L/R LEAF	<input type="checkbox"/>
	SPRING - LEAF RIGHT REAR	
TAKD8	9L84 5726 A R/R LEAF	<input type="checkbox"/>
	STAR RATING PERF LEVEL	
A5MAB	STAR RATING PERF LEVEL 1	<input type="checkbox"/>

STEERING DAMPER	
GMBAA	LESS STEERING DAMPER
STEERING WHEEL	
GTAAE	STEERING WHEEL-LEATHER WRAPPED
STEERING WHEEL - REDUNDANT CONTROLS	
GTEAA	LESS REDUNDANT CTL -STEER WHL
SUSPENSION	
DWAAF	STANDARD DUTY SUSPENSION
TERRITORIES - GENERIC COUNTRY GROUPINGS	
SATAB	GENERIC COUNTRY GROUP 1
TERRITORIES - NORTH AMERICA PRINCIPLE	
WANAB	USA
WAN01	ALL U.S.A. AND CANADA
WAN02	USA,USA TERR,CAN,MEX
WAN03	ALL USA AND MEXICO
THERMOMETER-OUTSIDE TEMP	
HJEAB	OUTSIDE TEMP THERMOMETER
TIRE SPARE	
D3MAQ	SPARE TIRE - T145/90R17
TIRES - 16 INCH	
D3JU6	P235/70R-16T BSW A-S
TPO/ORDER CODES 301-599	
YZCAB	TPO/ORDER CODE 305A
TRAILER TOWING	
C1CAA	LESS TRAILER TOWING PACKAGE
TRANSMISSION	
TR W6	6 SPD AUTO TRANS 6F MID-RANGE
TR 0A	ALL AUTOMATIC TRANSMISSIONS
TR 06	ALL 6 SPD AUTO TRANSMISSIONS
TRANSMISSION GEARSHIFT KNOB	
CAEBW	GEARSHIFT KNOB - MIC INSERT
UNDERBODY PROTECTION	
A1CAA	LESS UNDERBODY PROTECTION
VERSION	
AAAAD	XLT VERSION
VERSION - EXTERIOR - APPEARANCE PACK	
ABFAA	LESS EXT APPEARANCE PACK
VERSION - LIVERY PACKAGE	
YQAZZ	NO POS SEL FROM THIS FAMILY
VERSION PACKAGES	
AACAA	LESS VERSION PACKAGES
VISOR - SUNVISORS - DRIVER	
BCAAE	SUNVISOR,SINGLE-DRV ILLUM
VISOR - SUNVISORS - PASSENGER	
BCBAE	SUNVISOR,SINGLE-PASS ILLUM